



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:  
**SR-6J**

May 19, 2020

Mr. Wilmer Reyes, Project Coordinator  
ViacomCBS  
20 Stanwix St.  
Pittsburgh, PA 15222

Re: Review of the Remedial Design/Remedial Action Work Plan, New Jersey Zinc/Mobil  
Chemical Site, DePue, Illinois

Dear Mr. Reyes,

The U.S. Environmental Protection Agency (U.S. EPA) has reviewed the document entitled: *Remedial Design/Remedial Action Work Plan (RD/RA WP)* for the New Jersey Zinc/Mobil Chemical Corporation Site, dated April 2020. Comments on the RD/RA Work Plan Specific Appendices are provided in Attachment 1. Comments on the remaining appendices were provided on May 6, 2020. Additional comments on the Quality Assurance Project Plan and the Health & Safety Plan will be submitted under separate cover.

If you have any questions or wish to discuss any of the comments, please do not hesitate to contact me at 312-886-6551.

Sincerely,

A handwritten signature in dark ink, appearing to read "S. Rolfes", is positioned below the word "Sincerely,".

Sarah Rolfes  
Remedial Project Manager

cc: Charlene Falco, Illinois EPA

## **Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan**

### **Specific Comments – Appendix I Stockpile Design and Management Plan**

1. The date on the Stockpile Design and Management Plan indicates it was prepared in 2018. Please make sure to update the plan to include work will be conducted under the UAO. Additionally, please review and update the volumes anticipated to be placed in Stockpiles based on the sampling conducted through 2019.
2. Section 1.0, First Paragraph – Please update this section to include the remedial contractor's information.
3. Section 1.0, Second Paragraph – This paragraph indicates that, according to the 2012 ROD "soil excavated at OU4...may be stockpiled for future use on OU3." Please revise this sentence as the ROD indicates that the final disposition and/or use of the stockpiles will be determined during the Feasibility Study to be conducted for OU3 (see page 2 of the 2012 ROD).
4. Section 2.0 – Ground elevation survey prior to placement of stockpiles should be conducted prior to placement of material in the stockpiles.
5. Section 2.1.2 – Please provide information on the long-term erosion and stormwater management for the stockpiles. If no controls are proposed, please include an inspection schedule to ensure no measures are necessary for a period after the vegetative cover has been established.
6. Section 2.2 – Soils are segregated based on exceedances of Construction Work RGs. Please provide information on whether any waste characterization sampling has been conducted on the materials.
7. Section 2.2.2 – Please reference the air monitoring and dust control plans (author, date) and provide them as appendices/attachments.
8. Section 2.2.3 – Update this section to include U.S. EPA.

### **Specific Comments – Appendix J Post Remediation Checklist**

No Comments on Appendix J.

### **Specific Comment – Attachment 1 Site-Specific HASP and ERP**

Comments regarding the Site-Specific HASP and ERP will be submitted under separate cover.

### **General Comment – Attachment 2 Construction Stormwater Pollution Prevention Plan**

1. Some elements required by ILR10 are missing, such as maps showing drainage patterns, receiving waters of note. It may not be possible to provide this information for individual residential properties, but larger properties (such as parks) or geographic areas of the Village should be accounted for. Please see ILR10 for contents of SWPPPs.

### **Specific Comments – Attachment 2 Construction Stormwater Pollution Prevention Plan**

1. Section 1.2 – This section indicates that all members will monitor stormwater, erosion, and sediment control devices on a daily basis and report observations to the Project Manager. Please provide additional information regarding the daily monitoring by employees, such as whether daily work sheets/logs will include a space to log control devices.
2. Section 4.2 – Please indicate whether the material storage area will include any secondary containment.

## **Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan**

3. Section 5.2 – Stockpiles should remain covered until the fast-germinating seed mix is stabilized to ensure no wind-blown erosion of the stockpiles. Please note the cleanup decision for OU3 will determine the final decision for these stockpiles. The permanent vegetation that will be placed on these stockpiles will be necessary to ensure there is no wind-blown erosion from these piles. Additionally, long-term stormwater management may be necessary for these stockpiles.
4. Section 6.1 – Please include the definition of a “major storm event” that triggers inspections. Inspections should also include all locations that have controls in place, including excavations, storm drain inlets, etc.

### **Specific Comments – Attachment 3 Traffic Management Plan**

1. Section 4.2 - The TetraTech work plan says that "Due to weight constraints, the use of the Marquette Street Bridge will be avoided to the extent practical. Therefore, soil excavated from the White City portion of the Village (located in the northeastern portion of the East Subarea) will be generally transported to the FPSA via Illinois Route 29." The Traffic Management Plan and associated figures include usage of the Marquette Street Bridge. Please review and update all plans and figures accordingly.
2. Section 5.0 – The material presented in Section 5 is slightly different than the information that is in the emergency response plan presented in the HASP. Please make sure these plans, including the contact list, are consistent.

### **Specific Comments – Attachment 4 Construction QA/QC Plan**

1. Section 2.1 – Please update this section to indicate that all RGs were established in the ROD.
2. Section 3.1 – Please update this section to include IEPA as the support agency and Charlene Falco as the RPM.
3. Section 3.4 – Please update this section to include the survey method to confirm excavation depths and extent.
4. Section 6.3 - Management of technical data should be done in accordance with Site Data Management Plan. All data types collected by both TT and ENTACT should be listed in data management plan.
5. Section 8.2- How will the data noted in this section be collected and managed? Ensure data management plan reflects all of these items.
6. Section 8.3.1 – A discussion of the restoration of property (i.e., what will be kept, removed/returned, replaced, any vouchers, etc.) should be included in discussions with the property owner.
7. Section 8.3.2 – Please verify if third-party utility locates will be conducted and update all plans accordingly.
8. Section 8.3.2 – Additional comments concerning the dust controls and air monitoring have been provided on other appendices/attachments. Please verify that all appendices/attachments are updated.
9. Section 8.3.3 – Please provide information on how the dig depth will be verified and include the information in this section.
10. Section 8.3.3 – Please provide information on how material staged on properties that will be utilized will be managed on the property. Include information regarding whether or not the pile

## **Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan**

will be covered, erosion/SWPPP controls, and survey verification/buffer to ensure no impacted material is utilized as backfill.

11. Section 8.5.3 - The ROD stipulates that restored vegetation will be maintained until established or up to 1 year.
12. Section 8.6 – Please update this section to include that all off-site disposal will comply with the Off-Site Rule (see Section 5.7 of the UAO SOW).
13. Property Restoration Agreement Attachment – EPA recommends that additional details are added to this agreement, including specifics concerning restoration and including photos. Note that nothing is mentioned about plants/gravel/seed/garden etc. in the pre-excavation agreement.

### **Specific Comments – Attachment 5 Waste Material Transportation and Temporary Storage Plan**

1. Section 3.1, Second Paragraph – Please see comments on the Construction Stormwater Pollution Prevention Plan for comments concerning the temporary stockpiles that will be located on the FPSA (OU3).
2. Section 4.0 – Please verify and indicate that the proposed landfill for off-site disposal complies with the Off-Site Rule (see Section 5.7 of the UAO SOW).
3. Section 5.1, First Paragraph – Please include the schedule for inspection of the erosion control measures for both properties and the FPSA. Please provide detail on measures to prevent wind-borne erosion (covers, sprays, foams, etc.).
4. Section 5.2, First Paragraph – Please detail how dust will be controlled during active remediation on properties. Also provide detail on dust control measures for the stockpiles on the FPSA.
5. Section 5.2, Second Paragraph - The air monitoring procedures need to be more detailed and consistent between all plans. Note additional comments concerning the air monitoring are provided on the ENTACT H&S Plan.
6. Section 6.0 – Please revise this Section to include any additional H&S measures that are being implemented in response to COVID-19.
7. Section 7.0 – Documentation should also include erosion control measure inspection logs and repairs. Documentation should also include a detailed log of dust control implementation measures in response to both visual observations and air monitoring.
8. Figure 2 – The transport route from the East subarea appears to utilize the Marquette Street Bridge which is not in agreement with other sections/attachments of this Work Plan. Please revise the appropriate sections so they are in agreement. Additionally, please detail if there will be a dedicated haul route marked on the FPSA for trucks.

### **General Comments – Attachment 6 Data Management Plan**

1. Editorial errors are prevalent throughout the document. For example, the DMP is cited as version history 1 throughout the document, however the cover page indicates it is version 0. Also note the timeline of Rev 0 and Rev 1 provided in Table 1. The Table of Contents includes “Error! Bookmark not defined” for several figures. Section 3.0 Data Management Workflows list Real-Time Continuous Data, however the sub-section is not provided. Please review entire document for additional editorial errors, edit when needed, and resubmit.
2. It appears that data will be stored on Tetra Tech’s FedRAMP Azure sever, however the DMP Figures indicates it will be stored on R5 ER Cloud. Please resolve this discrepancy.

## **Attachment 1 – Comments on the Remedial Design/Remedial Action Work Plan**

### **Specific Comments – Attachment 6 Data Management Plan**

1. Section 3.6, Third Paragraph – Data should be stored on TetraTech servers and not on response.epa.gov website.
2. Section 4.0, Table 2 - Please revise data streams to clearly indicate a summary of information that is being captured as described in the Work Plan and Field Sampling Plan. For example, survey data, field notes, pictures, video data captured during the removal, etc. should be captured in this table.
3. Section 5.0, First Paragraph - Please state clearly that per the UAO (Section 3.7 Webviewer) the respondent is responsible for maintaining a Webviewer for the site relating to the status of OU4. The Webviewer should provide information relating to the status of access agreement, soil sampling status, soil sampling results, and remediation status. This information should be part of the Data Stream Summary in Section 4.0.
4. Section 5.2, First Paragraph - Please address PII and the Information Sharing and Restrictions on Information Memorandum of Understanding (see Section 3.9 of the UAO SOW).